

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

WAG ACQUISITION, L.L.C.,

Plaintiff,

v.

GOOGLE LLC and
YOUTUBE, INC.,

Defendants.

Civil Action No. 6:21-cv-00816-ADA

JURY TRIAL DEMANDED

**DECLARATION OF NAINA SONI IN SUPPORT OF DEFENDANTS' REPLY IN
SUPPORT OF THEIR MOTION FOR DISMISSAL OF PLAINTIFF'S COMPLAINT
PURSUANT TO FED. R. CIV. P. 12(B)(6) FOR FAILURE TO STATE A CLAIM**

I, Naina Soni, declare and state as follows:

1. I am an attorney at the law firm of Cooley LLP, counsel for Defendants Google LLC and YouTube, LLC in the above-captioned matter. I have personal knowledge of the facts set forth in this declaration and, if called to testify as a witness, could and would testify competently thereto.

2. I submit this declaration in support of Defendants' Reply in Support of Their Motion for Dismissal of Plaintiff's Complaint Pursuant to Fed. R. Civ. P. 12(b)(6) for Failure to State a Claim.

3. Attached hereto as Exhibit 1 is a true and correct copy of Plaintiff's preliminary infringement contentions for U.S. Patent No. 9,729,594, dated November 15, 2021. Plaintiff designated its preliminary infringement contentions for U.S. Patent No. 9,729,594 as "Confidential Under Interim Protective Order."

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on November 22, 2021 in Washington, D.C.

/s/ Naina Soni
Naina Soni